

RECEIVED FILED

2002 OCT 15 PM 5: 01

IDAHO PUBLIC UTILITIES COMMISSION

101 S. Capitol Boulevard, Suite 1900 Boise, Idaho 83702 main 208.389.9000 fax 208.389.9040 www.stoel.com

MARY S. HOBSON Direct (208) 387-4277 mshobson@stoel.com

October 15, 2002

VIA HAND DELIVERY

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street Boise, ID 83720-0074

Re:

Case No. QWE-T-02-11 GNR-7-03-16

Dear Ms. Jewell:

Enclosed for filing are seven (7) copies of the **Petition to Intervene of Qwest Corporation**.

If you have any questions or comments, please let me know.

Very truly yours,

Mary State.

Mary S. Hobson

:blg

Enclosures

Oregon Washington California Idaho

Mary S. Hobson (ISB #2142) Stoel Rives LLP 101 South Capitol Boulevard - Suite 1900 Boise, ID 83702-5958

Telephone: (208) 387-4277 FAX: (208) 389-9040

Attorneys for Owest Corporation

RECEIVED EX FILED 2002 OCT 15 PM 5: 01

UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF POTLATCH TELEPHONE COMPANY; CENTURYTEL OF IDAHO; CENTURYTEL OF THE GEM STATE; AND THE IDAHO TELEPHONE ASSOCIATION FOR A DECLARATORY ORDER PROHIBITING THE USE OF "VIRTUAL" NXX CALLING

CASE NO. GNR-T-02-16

PETITION TO INTERVENE OF QWEST CORPORATION

Qwest Corporation ("Qwest"), by and through its attorneys of record, respectfully petitions the Idaho Public Utilities Commission ("Commission") for leave to intervene in the above captioned proceeding pursuant to the Commission's Rules of Practice and Procedure for the following reasons:

- 1. Qwest is a corporation authorized to do and doing business in the state of Idaho, with its principal Idaho business office located at 999 Main Street, Boise, Idaho, 83702. Qwest is a corporation organized under the laws of the state of Colorado and is authorized to engage in the furnishing of general telephone service in the north central and southern portions of Idaho and elsewhere in the western United States.
- 2. Qwest has a direct and substantial interest in the above entitled proceedings because this case potentially deals with issues that could impact the operations of Qwest in Idaho.
- 3. Qwest does not expect that its intervention will broaden the issues in this case or prejudice any party.

- 4. Qwest desires to intervene in order that it might receive documents and if its interests require, comment, cross-examine witnesses and present evidence in this case. At this point, Qwest cannot inform the Commission or other parties how involved its individual participation in this proceeding will be because the positions of the other parties and the Commission's Staff are not yet fully known. Therefore, Qwest cannot presently inform the Commission as to the type of evidence it will present if any, or the length of time necessary for such presentation.
- 5. It is respectfully requested that all pleadings, testimony, exhibits, orders of the Commission and any other documents relating to this proceeding be served upon the Qwest and its attorney, to wit:

Mary S. Hobson Stoel Rives LLP 101 S. Capitol Blvd., Suite 1900 Boise, ID 83702-5958

RESPECTFULLY SUBMITTED This 15th day of October, 2002.

Mary S. Hobson

Stoel Rives LLP

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of October, 2002, I caused a true and correct copy of the foregoing **PETITION TO INTERVENE OF QWEST CORPORATION** to be served by the method indicated below, and addressed to the following:

| Jean D. Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83702-5983 Telephone: (208) 334-0338 jjewell@puc.state.id.us | [X] [] [] [] | Hand Delivery U. S. Mail Overnight Delivery Facsimile Email |
|---|-------------------------|---|
| Weldon Stutzman, Deputy Attorney General Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83702-5983 Telephone: (208) 334-0318 Facsimile: (208) 334-3762 wstutzm@puc.state.id.us | [X] [] [] [] | Hand Delivery U. S. Mail Overnight Delivery Facsimile Email |
| Ted Hankins, Director State Government Relations P.O. Box 4065 Monroe, LA 71211-4065 ted.hankins@centurytel.com | [] | Hand Delivery U. S. Mail Overnight Delivery Facsimile Email |
| Gail Long, Manager External Relations P.O. Box 1566 Oregon City, OR 97045-1566 gail.long@tdstelecom.com | | Hand Delivery U. S. Mail Overnight Delivery Facsimile Email |
| Morgan W. Richards Moffatt Thomas Barrett Rock & Fields 101 South Capitol Boulevard – 10 th Floor P.O. Box 829 Boise, ID 83701 Telephone: (208) 385-5451 mwr@moffatt.com | [X] [] [] [] | Hand Delivery U. S. Mail Overnight Delivery Facsimile Email |

Clay Sturgis, Senior Manager Moss Adams LLP 601 Riverside – Suite 1800 Spokane, WA 99201-0663 clays@mossadams.com

| [] | Hand Delivery |
|-------|--------------------|
| [X] | U. S. Mail |
| [] | Overnight Delivery |
| [] | Facsimile |
| [] | Email |

Brandi L. Gearhart, PLS

Legal Secretary to Mary S. Hobson

Stoel Rives LLP